

EXHIBIT I

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

4 -----x
5 IN RE GOOGLE PLAY STORE Case No.
6 ANTITRUST LITIGATION 3:21-md-02981-JD

7 THIS DOCUMENT RELATES TO: MDL No. 2891

8 Epic Games Inc. v. Google LLC,
9 et al.,
10 Case No. 3:20-cv-05671-JD

11 In re Google Play Consumer
12 Antitrust Litigation,
13 Case No. 3:20-cv-05761-JD

14 In re Google Play Developer
15 Antitrust Litigation,
16 Case No. 3:20-cv-05792-JD

17 State of Utah, et al.,
18 v. Google LLC, et al.,
19 Case No. 3:21-cv-05227-JD

20 Match Group LLC, et al.,
21 v. Google LLC, et al.,
22 Case No. 3:22-cv-02746-JD

23 *HIGHLY CONFIDENTIAL - UNDER PROTECTIVE ORDER*

24 REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF
25 PURNIMA KOCHIKAR
26 Wednesday, August 31, 2022

27 Reported By: Lynne Ledanois, CSR 6811

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1 Q If you could turn -- I'm going to point to
2 you a few of the topics in here. If you can turn to
3 Page 15, there is a Topic 16. Let me know when
4 you're there.

5 A Yes, I'm there.

6 Q I'm not going to read the whole thing, but
7 in a nutshell this is asking for testimony about
8 negotiations with Activision Blizzard relating to
9 Google Play and related topics.

10 Do you see that?

11 A Yes, I do.

12 Q And you're aware that Google designated
13 you as Google's corporate representative to testify
14 as to Topic 16?

15 A Yes.

16 Q And are you prepared to testify as
17 Google's corporate representative on this Topic?

18 A Yes, I am.

19 Q Please turn to Page 17, Topic 25. Take a
20 look at that topic, please.

21 A Yes.

22 Q This is asking, again without quoting, for
23 Google's testimony about a number of project names
24 and other sort of dealings with developers relating
25 to Google Play.

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1 Do you see that?

2 A I do.

3 Q And are you aware that Google designated
4 you to testify on behalf of Google as to this topic?

5 A Yes.

6 Q And are you prepared to testify as
7 Google's corporate representative on Topic 25?

8 A I am.

9 Q Thank you. And finally, Page 20, you
10 should see Topic 34, please.

11 A Yes.

12 Q And Topic 34 seeks testimony from Google
13 about the benefits to Google from offering a diverse
14 set of developers and apps on Google Play and
15 related topics.

16 Do you see that?

17 A Yes.

18 Q And you're aware that Google designated
19 you to testify on behalf of Google on this topic?

20 A Yes.

21 Q And are you prepared to testify as
22 Google's corporate representative on Topic 34?

23 A Yes, I am.

24 Q Just a quick question on this one. What
25 did you do specifically to prepare on Topic 34?

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1 A Yes.

2 Q And he said that the deal is only worth it
3 if it saves Play.

4 Do you see that?

5 A Yes, when you -- yes. No individual title
6 saves anything, right. I do think he's pointing out
7 if the risk to Play is lowered.

8 Q Well, the concern that was discussed at
9 the time was that if ABK launched an alternative
10 Android app store, that could lead to other
11 developers either launching their own app store or
12 launching their titles through ABK's alternative app
13 store; correct?

14 A It was discussed.

15 Q And stopping Activision from launching its
16 own alternative app store would stop that potential
17 contagion risk that was just identified?

18 A Getting Activision to commit to Play, they
19 could still continue to invest in the app store. None
20 of our conversations was contingent upon them stopping
21 anything. We just wanted them to understand the value
22 Play can bring and, more importantly, the value Google
23 can bring.

24 Q But your expectation was that if you could
25 secure their launch on Play, that Activision

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1 Blizzard King would not spend their time and money
2 investing on an alternative Android app store;
3 correct?

4 A That they would see the value of building
5 games versus -- yes.

6 Q If you look to the first page of this
7 email.

8 A Yes.

9 Q The top email is from you after various
10 back and forth where it starts, "If we don't do a
11 deal."

12 Do you see that?

13 A Yes.

14 Q You say, "If we don't do a deal, ABK will
15 continue to try different ways to get revenues off
16 of Play."

17 Do you see that?

18 A Yes.

19 Q You go on to say, "Building a stronger
20 relationship," et cetera, "will preclude investments
21 in alternative ways of monetizing off Play."

22 Do you see that?

23 A Yes.

24 Q You also refer to the alternative Android
25 app store as one of the options that they were

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1 didn't do any other investigation on that topic.

2 Q One of the other Hug targeted developers
3 was Riot Games, as you mentioned earlier; right?

4 A Yes.

5 Q Google, in fact, did sign a Project Hug
6 deal with Riot?

7 A Yes.

8 Q And one of the risks that Riot presented
9 was that Riot would launch its game outside of
10 Google Play?

11 A Yes.

12 Q Let's do another document. Give it one
13 chance to load here.

14 MS. MOSKOWITZ: It will be, when it's
15 loaded, GOOGLE-PLAY-007424789 through 4790. This
16 will be PX1523.

17 (Exhibit 1523 was marked for identification
18 by the court reporter.)

19 THE WITNESS: Not loaded yet.

20 BY MS. MOSKOWITZ:

21 Q No problem, I was late in asking for it.

22 A Yes, I have it.

23 Q This is a document titled "Riot GVP Deal."
24 Do you see that?

25 A Yes.

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1 Q And it says, "A year ago, we pulled all
2 stops."

3 A Yes.

4 Q Paren, "promised them \$10 million
5 co-marketing for before they signed" Hug, for
6 example.

7 Do you see that?

8 A Yes.

9 Q It says that you pulled all those stops to
10 "get Riot to stop their in-house 'app store'
11 efforts."

12 Do you see that?

13 A Yes.

14 Q So that \$10 million in co-marketing was
15 before there was even a Project Hug deal on the
16 table?

17 A Oh, before they signed the deal. I think
18 Hug -- I think the Games Velocity Program was at least
19 being discussed. This was before they signed the GVP
20 deal.

21 Q It was also before the Business Council
22 approved it; correct? Before the Business Council
23 approved Project Hug; correct?

24 A Probably. I can't think about the dates,
25 however, it's worth noting that we often do

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1 co-marketing things which are outside of GVP. The
2 Games Velocity Program is a very specific thing. We
3 do tons of different co-marketing and other
4 partnership co-investments.

5 Q So at the time this co-marketing was used
6 to stop the in-house app store efforts that Riot was
7 doing, Riot had told you that it was in the process
8 of developing its own app store; correct?

9 A Riot had told us and we were working very
10 hard -- as you can see, we're always trying very hard
11 to make sure that we can win businesses. The
12 competition is tough. And we told Riot that we can
13 really invest in growing.

14 Riot was also coming from a very
15 console/PC world where they had a certain kind of
16 business model where people would say, this is the
17 marketing commitment we do. This is how we would
18 promote you, et cetera.

19 So we had to figure out a common language
20 before we could even understand what mobile does and
21 how mobile works.

22 So that was our work with them. We
23 literally had multiple workshops for them to
24 understand even how mobile works.

25 Q And if you wanted them to come to mobile

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1 through Google Play Store rather than through their
2 own alternative Android app store?

3 A We wanted them to consider Play Store. They
4 could still continue to work on their app store.

5 Q The way you wrote this is that you pulled
6 out all the stops to get Riot to stop their in-house
7 app store efforts. Isn't that what you wrote?

8 A That is what's our perhaps, you know, lofty
9 ambition. But there was no conversation about them
10 stopping anything.

11 Q But they did?

12 A It was much more about value that we can
13 bring.

14 Q But they did stop; right?

15 A Well, they did not succeed on mobile.

16 Q But they didn't launch an app store either
17 on Android; correct?

18 A They didn't, but neither did their apps do
19 well.

20 Q So separate from how their games
21 performed, Riot did not launch an Android app store
22 on Android; correct?

23 A Yes.

24 Q They also did not launch any of their apps
25 outside of Google Play; correct?